

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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RALPH ROMEO and KIRA MILO,

Plaintiffs,

07 Civ 2863 (LMS/MDF/GAY)

-against-

**AFFIDAVIT OF DRITA NICAJ
IN SUPPORT OF MOTION TO BE
RELIEVED AS PLAINTIFFS'
COUNSEL**

JOHN E. ANDRUS MEMORIAL, INC.
and OLIVE MOHAMMED, individually,

Defendants.
-----X

State of New York)
):ss
County of Westchester)

DRITA NICAJ, being duly sworn deposes and says:

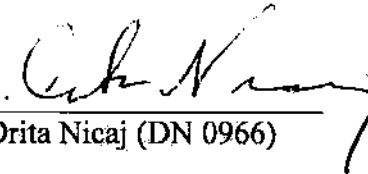
1. I am an associate of the law firm of Lovett & Gould, LLP, attorneys for the Plaintiffs Ralph Romeo and Kira Milo in the above captioned proceeding.
2. I submit this affidavit in support of the application by our firm for leave to withdraw as Plaintiffs' counsel in the above captioned action.
3. The reason for Lovett & Gould's application to withdraw as counsel is that after discussions with them as their counsel, they and we, as their counsel, are unable to agree on the future course of the instant litigation. By reason of the attorney-client privilege, we are constrained from revealing further details surrounding that inability to agree on significant aspects of the litigation.
4. As a result, we will not be able to effectively represent Plaintiffs in this or any other matter and continued representation would be unreasonably difficult.

5. We have previously provided Plaintiffs with due notice of our intent to make the instant motion to withdraw.


6. They have, to date, declined to consent to the withdrawal.

7. In order to protect Plaintiffs' interest, it is respectfully requested that the Court stay discovery pending the instant motion and this Court extend the discovery deadline until a date not less than 120 days after the Court rules on this application.

WHEREFORE, for the reasons set forth herein, it is respectfully requested that the application of Lovett & Gould, LLP to withdraw as counsel for the Plaintiffs be granted in all respects.


Drita Nicaj (DN 0966)

Sworn to before me this
26 day of Sept, 2007


Notary Public

ANN B. FRANK
Notary Public, State of New York
No. 01FR5022348
Qualified in Westchester County
Commission Expires January 10, 2010